EXHIBIT 6

FILED UNDER SEAL

Case 3:20-cv-06754-WHA Document 865-48 Filed 09/05/23 Page 2 of 7 CONFIDENTIAL

1	UNITED STATES DISTRICT COURT
2	FOR THE NORTHERN DISTRICT OF CALIFORNIA
3	x
	SONOS, INC.,
4	
	Plaintiff,
5	vs. Case No. 3:21-CV-07559-WHA
6	GOOGLE LLC,
	Defendant.
7	x
8	-AND-
9	
10	UNITED STATES DISTRICT COURT
11	FOR THE NORTHERN DISTRICT OF CALIFORNIA
12	x
13	GOOGLE LLC,
14	Plaintiff,
15	vs. Case No. 3:20-CV-06754-WHA
16	SONOS, INC.,
	Defendant.
17	** CONFIDENTIAL **
18	**CONFIDENTIAL**
19	
20	REMOTE VIDEOTAPED DEPOSITION BY VIRTUAL ZOOM OF
21	JONI HOADLEY
22	Wednesday, April 13, 2022
23	Papartod Dur Iumna Indanaia CCD 6011
24	Reported By: Lynne Ledanois, CSR 6811 Job No. 5183741
25	UUD 1NU. 3103/41
	Page 1

	CONTIL		
1	right?	1	that problem that we were trying to solve.
2	A Yes.	2	MS. AUBRY: All right. I'm going to
3	Q So it sounded let me know if you	3	introduce the two next exhibits.
4	disagree.	4	(Exhibit 9 was marked.)
5	But it sounded like you remembered iTunes	5	(Exhibit 10 was marked.)
6	coming out around the time that you were at	6	BY MS. AUBRY:
7	MusicMatch; is that fair?	7	Q I've introduced what are now Exhibits 9
8	A Yes.	8	and 10.
9	Q Are you aware of, I guess, Apple's AirPlay	9	A Okay. They showed up in my Shared drive.
10	systems?	10	Should I open one of them?
11	A Am I aware of it? Yes.	11	Q Yes. If you could open Exhibit 9, that
12		12	would be great.
	Q Do you remember when you first became aware of it?		•
13		13	I was going to state for the record that
14	A No, I don't recall when I was first made	14	Exhibit 9 bears a starting Bates Number SONOS-SVG2-00026283.
15	aware of it. Whenever it launched, probably.	15	
16	Q Whenever it launched because that is	16	Ms. Hoadley, do you recognize Exhibit 9?
17	something you would have paid attention to or	17	A Do I recognize it?
18	A Yes.	18	I mean, my name is on it, so I would have
19	Q Stepping back to 2010, do you remember	19	been the recipients of this. So, yes, in that
20	what the AirPlay system capabilities were?	20	sense, yes, I recognize it. But it's not a document
21	A In 2010, I have no recollection if there	21	I have seen in at least a few years.
22	even was AirPlay.	22	Q So do you see at the top where it says
23	Q During your time at Sonos, did you work on	23	Message, that this is an email chain, and the top
24	a project called Play-to-Sonos or Sent-to-Sonos?	24	message is from Rob Lambourne on July 12th, 2011;
25	A Yes.	25	right?
	1 age 94		1 age 90
			
1	Q Do you remember when that was, roughly?	1	A Yes.
1 2	Q Do you remember when that was, roughly?A No, I don't recall exactly when that was.	1 2	A Yes. Q As you were just stating, you were one of
2	A No, I don't recall exactly when that was.	2	Q As you were just stating, you were one of
2 3	A No, I don't recall exactly when that was.Q Do you remember what prompted that	2 3	Q As you were just stating, you were one of the recipients, Joni.Hoadley@sonos.com; right?
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1	AFTERNOON SESSION	1	A Because we wanted to allow anyone who was
2	VIDEOGRAPHER: We are back on the record.	2	listening to music together to be able to pick and
3	The time is 1:23 p.m.	3	choose the songs that they wanted to listen to,
4	BY MS. AUBRY:	4	collaborate.
5	Q Ms. Hoadley, did you speak with your	5	Q Is this idea of collaboration a more
6	attorney during the lunch break?	6	sourceful experience related to the network's music
7	A No, I did not.	7	playback patents that you were an inventor on?
8	Q I want to turn back to Exhibit 2 briefly,	8	A I honestly don't know.
9	which was your LinkedIn profile.	9	(Exhibit 11 was marked.)
10	A Okay. I have that up on my screen.	10	BY MS. AUBRY:
11	Q If you can scroll to Page 3 of Exhibit 2,	11	Q I am marking what's going to be Exhibit
12	which is your bullet points for your time at Sonos.	12	11.
13	A Okay.	13	A Okay.
14	Q The fourth bullet point down, do you see	14	Q Let me know when you have that up.
15	where it says, "Spearheaded the creation and three	15	A I do.
16	major redesigns of the Sonos apps (mobile and	16	Q This is a document with starting Bates
17	desktop)"?	17	Number SONOS-SVG2-00026981.
18	A Yes.	18	Ms. Hoadley, what is Exhibit 11?
19	Q Can you tell me a little bit more about	19	A It appears to be a document from Andrew
20	what those three major redesigns were?	20	Schulert to myself, Nick Millington and Craig Wisneski
21	A I honestly don't remember the details.	21	related to software strategy.
22	I know at least one of them was related to	22	Q If you scroll down to Page 2 of Exhibit
23	a brand redesign that was taking place. So there	23	11, ending in Bates 26982, this is the email from
24	was a new logo and new color pallet that was being	24	you to Andrew Schulert, Nick Millington and Craig
25	used by the company in its packaging and marketing Page 110	25	Wisneski; right?
	1 uge 110		Tage 112
1	materials.	1	A Yes.
2	I recall one of those redesigns was	2	Q Under Number 1 in your email, this is from
2 3	I recall one of those redesigns was related to that, but I don't remember the other two,	2 3	Q Under Number 1 in your email, this is from July 7, 2011, you listed a couple of main areas.
2 3 4	I recall one of those redesigns was related to that, but I don't remember the other two, necessarily.	2 3 4	Q Under Number 1 in your email, this is from July 7, 2011, you listed a couple of main areas. Do you see that?
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2 3 4 5	I recall one of those redesigns was related to that, but I don't remember the other two, necessarily. Q When you started at Sonos, is it fair to say that you had experience developing software for hardware?	2 3 4 5 6 7	Q Under Number 1 in your email, this is from July 7, 2011, you listed a couple of main areas. Do you see that? A Mm-hmm. Yes, I see it. Q The first one is "Working with Apple." Do you remember what that was about?
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		LIT	
1	A Yes, I do recall what that referred to.	1	Q So is it fair to say that as of the date
2	Q And what was that referring to?	2	of this email, July 28th, 2011, Sonos had never had
3	A Allowing people to use non-Sonos	3	a dependency on the Cloud?
4	applications to play music through the Sonos system.	4	A I cannot answer that. I don't recall.
5	Q Is it fair to say that this opening of	5	Q Who is Andrew Schulert?
6	control is related to what became Play-to-Sonos?	6	A He was a member of the software development
7	MR. LEE: Objection to form.	7	team.
8	THE WITNESS: I would not say that opening	8	Q Do you know why Mr. Schulert would have
9	up control became Play-to-Sonos. This was simply	9	stated that Sonos had never done a dependency on the
10	one way of describing that.	10	Cloud if that wasn't the case?
11	BY MS. AUBRY:	11	A So sitting here today, my recollection is
12	Q So opening up control was the same thing	12	that he was concerned about a specific use case in
13	as Play-to-Sonos, and you're just referring to it in	13	which the Sonos customer lost their Internet
14	a different way; is that right?	14	connection.
15	A Yes.	15	And so my recollection of his concern was
16	Q Okay. So scrolling back up in Exhibit 11,	16	that a complete reliance on the Cloud could cause
17	which is Andrew Schulert's response to your original	17	customers to not be able to play their music if
18	email, the last paragraph on Page 1 of Exhibit 11	18	their Internet connection went down.
19	where it says, "Brief tangent into architecture."	19	So sitting here today, I recall that was
20	Do you see that?	20	the dependency that he was referring to.
21	A Yes.	21	Q So your recollection is that the concern
22	Q And under Item Number 1 it says, "Under	22	was about customers not being able to play music if
23	what circumstances would we introduce a dependency	23	they lost their Internet connection; is that right?
24	on the Cloud where we didn't previously have one?"	24	A Correct. And this example that he's
25	Do you see that?	25	referring to about more than 65,000 tracks, that's
	Page 114		Page 116
1	A I do.	1	related to if you were you to lose your Internet music
1 2			related to if you were you to lose your Internet music connection while playing local tracks, right if you
			related to if you were you to lose your Internet music connection while playing local tracks, right if you were playing local tracks when I say "local," I
2	Q Was it fair to say that as of the date of	2	connection while playing local tracks, right if you were playing local tracks when I say "local," I
3	Q Was it fair to say that as of the date of this email, July 28th, 2011, Sonos did not have a	2 3	connection while playing local tracks, right if you
2 3 4	Q Was it fair to say that as of the date of this email, July 28th, 2011, Sonos did not have a dependency on the Cloud? A No, not necessarily.	2 3 4	connection while playing local tracks, right if you were playing local tracks when I say "local," I mean tracks that were stored on your network at home if you lost your Internet connection, we
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2 3 4 5 6	Q Was it fair to say that as of the date of this email, July 28th, 2011, Sonos did not have a dependency on the Cloud? A No, not necessarily. For the record, the yellow badge that says	2 3 4 5 6 7	connection while playing local tracks, right if you were playing local tracks when I say "local," I mean tracks that were stored on your network at home if you lost your Internet connection, we wanted you to still be able to play those tracks.
2 3 4 5 6 7	Q Was it fair to say that as of the date of this email, July 28th, 2011, Sonos did not have a dependency on the Cloud? A No, not necessarily. For the record, the yellow badge that says Exhibit JH-0011 is covering that up paragraph, so I	2 3 4 5 6 7 8	connection while playing local tracks, right if you were playing local tracks when I say "local," I mean tracks that were stored on your network at home if you lost your Internet connection, we wanted you to still be able to play those tracks. Q And so if a concern was to not have tracks
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1	Q We also talked about two patents on which	1	assessment.
2	you are listed as an inventor that are at issue in	2	The it was more, hey, these are the two
3	this lawsuit, which are titled, Networked Music	3	patents that are in question, but we didn't go over
4	Playback.	4	them.
5	Do you remember that?	5	BY MS. AUBRY:
6	A Yes.	6	Q Okay. So is it accurate to say that last
7	Q Do you remember what the goal of the	7	week you did not read the claims of your Networked
8	patents was?	8	Music Playback patents?
9	MR. LEE: Objection to form.	9	A Yes, that's a fair statement.
10	THE WITNESS: No, I don't remember what	10	Q Last week, did you read the abstracts of
11	the goal of the patents was.	11	your Networked Music Playback patents?
12	BY MS. AUBRY:	12	A No.
13	Q Do you remember if you were trying to	13	Q So sitting here today, can you tell me
14	address a particular problem with those patents?	14	what those Networked Music Playback patents are
15	A I'm finding the question confusing because I	15	about?
16	wasn't thinking about patents specifically. The	16	A Honestly, no.
17	patent happened after the ideation process took place.	17	Q Sitting here today, do you remember any
18	Q Can you walk me through the ideation	18	ideas that you came up with while at Sonos that made
19	process to patent filing?	19 20	it into the Networked Music Playback patents?
20	A I honestly don't recall.	20	A I couldn't specify.
21	Q You would agree that these Networked Music	22	I know that my work shows up in a number
22	Playback patents are related to some ideas you had	23	of patents, but I don't know which ones and to what
23 24	while at Sonos; right? A Yes.	24	extent. Q Okay. Let's take a step back and talk
25	Q What are those ideas?	25	about what you referred to as the "ideation
23	Page 170	23	Page 172
			· ·
1	A I honestly couldn't describe which ideas are	1	process."
2	in which patent, quite honestly.	2	How did you come about filing the patent
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	CONFID	EN	TIAL
1	check in with us and interview us about what we were	1	A No, I don't.
2	all working on in an effort to identify potential	2	Q Do you remember ever reviewing claims for
3	intellectual property.	3	applications that you were listed as an inventor on?
4	From there, they would then kind of decide	4	A I'm not even sure what a claim is, so I
5	what, if anything, they would pursue from a patent	5	don't know if I ever looked at one or not. I don't
6	perspective.	6	know what they are.
7	Once they decided there was something that	7	But, yes, while I was there, if they were
8	was potentially patentable, they would conduct more	8	filing any patents that involved me, I would have
9	interviews to gather materials and figure out who	9	reviewed them at the time, most likely.
10	the inventors were.	10	Q When you say "reviewed them at the time,"
11	At a high level, that's kind of the way it	11	you mean reviewed the writeup by the patent team?
12	would work at Sonos.	12	A I honestly am not sure what they would have
13	Q You mentioned a patent team that would	13	shared with those of us who were listed as inventors.
14	check in with you.	14	I'm not sure what we would have been asked to review
15	Do you remember who was on the patent	15	at that time.
16	team?	16	Q With respect to the Networked Music
17	A Jonathan Lang, I believe, was a member. At	17	Playback applications and corresponding Networked
18	one point, Mark Triplett.	18	Music Playback patents, do you remember what you
19	I believe there were others. Over time, I	19	contributed?
20	think the team grew, but those are the two that I	20	A Not specifically. My role was typically
21	remember.	21	related to the user experience and use cases involved.
22	Q Sorry. Did you say Jonathan Link?	22	Q Do you remember a particular use case that
23	A Lang, L-A-N-G.	23	ended up in a patent application called Networked
24	Q And Mark Triplet, like triplet?	24	Music Playback?
25	A Triplet, T-R-I-P-L-E-T-T, I believe.	25	A I don't know what, if any, of my work ended
23	Page 174	23	Page 176
1	Q Were those gentlemen Sonos employees or	1	up in those patents.
2		2	Q Are there any ideas from the 2011 time
3	A Jonathan was a Sonos employee, for sure.	3	frame that jump out at you as having been discussed
4	I don't recall if Mark was at first. I	4	in the context of a patent application filing?
5	don't recall.	5	A Not that I can recall. It's a really long
6		6	time ago, so I don't remember.
7	Q Did Mark become a Sonos employee?A I think so, but, honestly, I don't remember.	7	Q Besides the Networked Music Playback
			patent, do you remember being on any other patent
8	Q Just to go back to the process. So you	8	
9	mentioned the patent team would talk to you.		applications filed in 2011?
10	Did the patent team decide what was going	10	A No, I don't recall.
11	to be in the patent application?	11	Q Prior to 2011, do you remember being a
12	A Yes.	12	named inventor on any other patent applications?
13	Q Did you help the patent team prepare the	13	A I don't recall. Like I said, I show up as
14	Networked Music Playback applications?	14	an inventor on a number of patents, but I don't
15	A I don't recall if I did or not.	15	remember the timing on any of that stuff.
16	Q Do you know what a patent claim is?	16	Q Do you remember the first patents that you
17	A Not really.	17	were listed as an inventor on?
18	Q At the time the Networked Music Playback	18	A I don't, no.
19	applications were filed, do you remember discussing	19	Q Do you think that would have been at
20	claims?	20	Sonos?
21	A I don't remember when the patents were	21	A I don't believe I was on a patent prior to
22	filed, and I don't remember discussing claims, either.	22	Sonos. So, yes, I think that would have been at
23	Q If I tell you the patents were filed in	23	Sonos.
24	December 2011, do you remember discussing any claims	24	Q Tad Coburn is the other named inventor on
25	in that time frame? Page 175	25	the Networked Music Playback patents; is that right?
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